

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] JAIRO HUERTAS-MERCADO
Defendants.

Criminal No. 18-451 (FAB)

UNITED STATES' AMENDED DESIGNATION OF EVIDENCE FOR TRIAL

COMES NOW, the United States of America, by its attorneys and very respectfully states that pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure, it is providing notice of its intent to offer the following evidence in its case-in-chief at trial:

1. PRPD Citation to Defendant, issued June 13, 2018
2. PRPD and FBI Advice of Rights Forms, dated June 19-20, 2018
3. Defendant's admissions obtained in interviews with PRPD and FBI on June 19-20, 2018
4. Screenshots from Carolina Municipal Police Commissioner's phone
5. Photo identification of Defendant and co-defendant by Victim's mother
6. Photos of Defendant and co-defendant
7. Text messages sent from Victim's mother to FBI TFO Jonathan Rosado on June 29, 2018
8. Cell phone video of BMW X5 carjacking incident
9. 911 calls related to BMW X5 carjacking/kidnapping incident
10. DTOP Record for Nissan Altima
11. Photographs of recovered Nissan Altima

12. DTOP Record for Toyota Camry
13. DTOP Record for Kia Sportage
14. Photographs of recovered/burned Kia Sportage
15. DTOP Record for BMW X5
16. Photographs of kidnapping/BMW X5 carjacking location
17. Photographs of “vertedero” and police intervention location
18. Photographs of recovered/searched BMW X5
19. (1) one .223 round of ammunition, recovered from kidnapping site
20. GoogleMaps depicting areas where crimes and police interventions occurred

The United States reserves the right, to identify and designate any additional evidence produced in discovery that it intends to introduce during its case-in-chief or subtract items from the list, as necessary.

WHEREFORE, the United States requests that its compliance with Fed. R. Crim. P. 12(b)(4) BE NOTED by this Honorable Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of December, 2019.

W. STEPHEN MULDROW
United States Attorney

S/ David T. Henek
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date a true and correct copy of the foregoing motion has been sent by ECF Filing to the attorney of record in this case.

S/ David T. Henek
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